

Message

From: Sincock, Jennifer [Sincock.Jennifer@epa.gov]
Sent: 7/10/2017 2:21:47 PM
To: Ramsey, Mindy S [Mindy.S.Ramsey@wv.gov]
CC: John Wirts [John.C.Wirts@wv.gov]; 'Scott.G.Mandirola@wv.gov' [Scott.G.Mandirola@wv.gov]; MacKnight, Evelyn [MacKnight.Evelyn@epa.gov]; drago, helene [drago.helene@epa.gov]; Shamet, Stefania [Shamet.Stefania@epa.gov]; Markovich, Jonathan [Markovich.Jonathan@epa.gov]
Subject: RE: Draft Addendum
Attachments: DRAFT WVDEP_MOA_Addendum 7_05_17-2_EPA comments 071017.docx

Hi Mindy,

Thank you for the opportunity to review WV's Draft Addendum to the MOA. Please see the comments below and also track changes comments in the attached.

EPA Comments on the Draft Addendum

1. The MOA only requires a schedule for the Attachment D waters. EPA recommends separating out the Table 1 schedule as the Addendum to be signed by EPA/WVDEP. The narrative discussion can be included in a cover letter or memo transmitting the Addendum.
2. EPA recommends including a section in the narrative discussion regarding "Engaging EPA" so EPA is fully informed about the progress of TMDL development and to allow for notice of potential issues in meeting deadlines. Proposed section could include a statement such as: "WVDEP will inform EPA of its progress toward meeting the monitoring and TMDL schedule found in Table 1. Quarterly (Monthly?) conference calls with EPA will be scheduled to discuss progress, issues, and/or concerns toward developing the TMDLs and meeting the Table 1 schedule."
3. EPA recommends including the addendum map as well as the map showing WV's watershed groupings. <http://www.dep.wv.gov/WWE/watershed/Documents/WVWatershedMap2017.pdf>
4. Table 1 comments – For Watershed Groupings column, recommend a footnote stating what D3, E3, E4, C4 means. For example, D3 indicates this is the third cycle of developing TMDLs for waters within Hydrologic Group D.
5. Table 1 comments – For TMDL Approaches column, recommend including a footnote providing further description of comprehensive vs targeted vs previously studied - ionic approaches.
6. Table 1 comments – For the Count of Litigation Waters column, the numbers in parentheses were a little cumbersome to track. It is also not clear if these are Attachment C or D waters from the MOA. Is it possible to reformat the table to show each major watershed on a separate line?
7. Table 1 comments – More information is requested on the breakout between Little Kanawha (Hughes River) slated for TMDL development by 3/1/2019 vs the Little Kanawha waters slated for TMDL development by 6/30/2024. The Hughes River has 7 total waters which were included in the MOA with 4 waters in Attachment C (TMDLs due by 2021) and 3 waters in Attachment D (TMDLs due by 2026). Table 1 includes 6 waters slated for TMDL development by 3/1/2019 but the 7th water is missing. For the remaining Little Kanawha watershed waters, there were 15 waters included in Attachment D of the MOA but Table 1 includes 16 waters. Is the missing Hughes River water included with the 16 Little Kanawha River waters slated for TMDL development by 6/30/2024? Perhaps this could be clarified by including the Attachment C or D assignments for these waters. Or by including only the Attachment C Little Kanawha waters to be addressed by 2021. Submitting more waters ahead of schedule is certainly acceptable.
8. Table 1 comments – In the third row from the bottom, Little Cacapon River is listed. Should this be Cacapon River instead?

Please let me know if there are any questions on these comments. We look forward to talking with you at 11 am. Thanks, Jen

Jennifer Sincock
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Check out the Chesapeake Bay TMDL website at: <http://www2.epa.gov/chesapeake-bay-tmdl>

From: Ramsey, Mindy S [mailto:Mindy.S.Ramsey@wv.gov]
Sent: Wednesday, July 05, 2017 12:10 PM
To: Sincock, Jennifer <Sincock.Jennifer@epa.gov>
Cc: John Wirts <John.C.Wirts@wv.gov>
Subject: Draft Addendum

Hello Jennifer,

Please find attached our draft addendum to the MOA, as well as a map that we have used for planning purposes. We have not included references to the map in the MOA, but believe it is useful to visualize the locations of the waters and TMDL projects and are including for your convenience.

We are available to discuss the draft addendum. Scott Mandirola and I will be out the rest of this week, but John Wirts and Pat Campbell are available if you all need to discuss sooner than later. We are all back on Monday and are open in the afternoon. Please respond also to John, if you would like to schedule a call.

Thank you,

Mindy S. Ramsey
TMDL Program Manager

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